

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CURTIS JAMES JACKSON III	:	
p/k/a 50 CENT, TOMORROW TODAY	:	
ENTERTAINMENT, INC., a New York	:	
corporation, and G-UNIT RECORDS, INC.,	:	
a New York corporation,	:	
	:	Case No. 09-CV-5583 (JFK)
Plaintiffs,	:	
	:	ANSWER TO
vs.	:	SUPPLEMENTAL
	:	COMPLAINT
	:	
LEE Q. ODENAT a/k/a "Q" d/b/a	:	
<u>WWW.WORLDSTARHIPHOP.COM</u> ,	:	
WORLDSTAR HIP HOP, INC.,	:	
a Nevada corporation, WORLDSTAR, LLC,	:	
a Delaware limited liability company,	:	
WSHH337, LLC, a Delaware limited	:	
liability company, JOHN DOE LLC(S)/	:	
CORPORATIONS,	:	
	:	
Defendants,	:	
	:	
vs.	:	
	:	
YVES MONDESIR,	:	
	:	
Third-Party Defendant.	:	
	:	
-----X	:	

Defendants Lee Q. Odenat d/b/a www.worldstarhiphop.com ("Odenat"), Worldstar Hip Hop, Inc. (Worldstar Hip Hop"), Worldstar, LLC ("Worldstar") and WSHH337, LLC ("WSHH337, LLC") (collectively "Defendants"), by and through their attorneys, Zarin & Associates P.C., answer Plaintiffs Curtis James Jackson III, Tomorrow Today Entertainment, Inc. and G-Unit Records, Inc.'s (collectively "Plaintiffs") Supplemental Complaint as follows:

1. Defendants admit the allegations contained in paragraph 1 of the Supplemental Complaint.

2. Defendants deny the allegations contained in paragraph 2 of the Supplemental Complaint.

3. Defendants deny the allegations contained in paragraph 3 of the Supplemental Complaint.

4. Defendants deny knowledge and information sufficient to form a belief as to the truth or falsity of the allegations contained in paragraph 4 of the Supplemental Complaint.

5. Defendants deny the allegations contained in paragraph 5 of the Supplemental Complaint.

6. Defendants admit the allegation contained in paragraph 6 of the Supplemental Complaint that Plaintiffs seek injunctive relief in this matter, but deny all the remaining allegations in this paragraph.

7. Defendants deny the allegations contained in paragraph 7 of the Supplemental Complaint.

AFFIRMATIVE DEFENSES

First Affirmative Defense

The Complaint fails to state a claim upon which relief can be granted.

Second Affirmative Defense

The Court lacks personal jurisdiction over all Defendants.

Third Affirmative Defense

Any alleged transfer of assets to Defendants Worldstar Hip Hop, Worldstar and WSHH337 was not fraudulent.

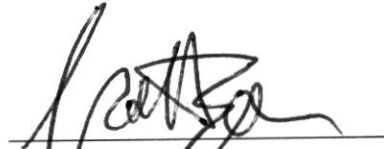
Fourth Affirmative Defense

The corporate veil between Defendant Odenat, on the one hand, and Defendants Worldstar Hip Hop, Worldstar and WSHH337, on the other hand, cannot be pierced.

WHEREFORE, Defendants demand a judgment dismissing Plaintiffs' Supplemental Complaint, along with an award of costs, disbursements and reasonable attorney fees, in addition to such other relief as this Court deems just and proper.

Dated: March 28, 2012

By:



Scott Zarin, Esq. (SZ 7134)
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New York, NY 10019
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Attorneys for Defendants
Lee Q. Odenat d/b/a
www.worldstarhiphop.com
Worldstar Hip Hop, Inc.
Worldstar, LLC
WSHH337, LLC

Certificate of Service

I, Scott Zarin, declare, under penalty of perjury, that on March 28, 2012, I caused to be served in *Jackson v. Odenat*, S.D.N.Y. Case No. 09-5583, via e-mail and U.S. Mail:

ANSWER TO SUPPLEMENTAL COMPLAINT

on counsel for Plaintiffs:

Karen Stetson, Esq.
Gray Robinson
1221 Brickell Avenue, Suite 1600
Miami, Florida 33131
karen.stetson@gray-robinsom.com

and on counsel for Third-Party Defendant Mondesir:

Jon Jekielek, Esq.
Jeklielik & Janis, LLP
295 Madison Avenue, 22nd Floor
New York, NY 10017
jon@jj-lawyers.com

Date: _____

3/28/12

A handwritten signature in black ink, appearing to read "Scott Zarin", is written over a horizontal line.